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Rachel Perillo

October 25, 2022

**By ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: United States v. Terrence Williams  
21 Cr. 603 (VEC)

Dear Judge Caproni:

I represent Terrence Williams in the above-referenced matter. Mr. Williams is scheduled to be sentenced on January 25, 2023. I write without objection from the government, by AUSA Ryan Finkel, respectfully requesting an adjournment of sentence to the spring of 2023 due to my current trial obligations before the Honorable Vernon S. Broderick in the matter of *United States v. Sayfullo Saipov*, 17 Cr. 722 (VSB). The *Saipov* matter is a complex terrorism case with a death-eligible defendant. We are currently in the middle of jury selection, and trial is expected to last until February 2023. I therefore seek an adjournment of Mr. Williams' sentencing to a date in mid-to-late spring 2023, which should provide me with enough time to prepare Mr. Williams' sentencing memorandum after my trial obligations have ended.

Additionally, a draft presentence report was filed on October 18, 2022, and our objections are currently due on November 1, 2022. Due to my current trial schedule, additional time is needed to review the presentence report with Mr. Williams to determine if any objections or corrections need to be made. For this reason, I respectfully request a 30-day

extension of the deadline to submit objections to the presentence report.

If the Court has any questions regarding this application, please do not hesitate to contact me.

The Court's time and attention to this matter is appreciated.

Respectfully submitted,  
/s/  
David Stern

cc: AUSA Daniel Nessim  
AUSA Ryan Finkel  
(By ECF)